

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Attorneys for Defendant
12 OLD REPUBLIC NATIONAL TITLE INSURANCE
13 COMPANY

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY; OLD
REPUBLIC TITLE COMPANY OF
NEVADA, DOES I through X; and ROES XI
through XX,

Defendants.

Case No.: 2:21-cv-00454-GMN-EJY

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
OLD REPUBLIC TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 11] AND MOTION FOR FEES
AND COSTS [ECF No. 12]**

(First Request)



1 Defendant Old Republic Title Insurance Company (“Old Republic”) and Plaintiff Bank of
2 America, N.A. (“BANA”) (collectively, the “Parties”), by and through their counsel of record,
3 hereby stipulate and agree as follows:

- 4 1. On March 18, 2021, BANA filed its Complaint in the Eighth Judicial District Court,
5 Case No. A-21-831366-C [ECF No. 1-1];
- 6 2. On March 18, 2021, Old Republic filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On April 19, 2021, BANA filed a Motion for Remand [ECF No. 11] and Motion for
9 Costs and Fees [ECF No. 12];
- 10 4. Old Republic’s deadline to respond to BANA’s Motion for Remand and Motion for
11 Costs and Fees is May 3, 2021;
- 12 5. Old Republic’s counsel is requesting an extension until June 3, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Old Republic requests a brief extension of time to respond to the Motion for Remand
15 and Motion for Costs and Fees to afford Old Republic additional time to respond to the
16 legal arguments set forth in BANA’s motions;
- 17 7. BANA does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Old Republic's deadline to respond to BANA's Motion for
2 Remand [ECF No. 11] and Motion for Costs and Fees [ECF No. 12] is hereby extended through
3 and including June 3, 2021.

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5 Dated: April 30, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant OLD REPUBLIC
TITLE INSURANCE COMPANY

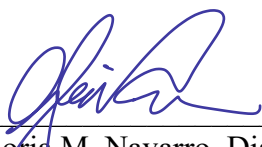
10 Dated: April 30, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Robbins
12 LINDSAY D. ROBBINS
13 Attorneys for Plaintiff BANK OF AMERICA,
14 N.A.

15 **IT IS SO ORDERED.**

16 Dated this 30 day of April, 2021.

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21 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT
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I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

VALERIE SEGURA
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP